

Greg/Rick - from Guam  
(note #'s 10 & 11)

TO: Ms. Doris Lee-Betuel, U.S. EPA, Region IX  
FROM: James L. Canto, Guam EPA

Date: July 6, 1988

SFUND RECORDS CTR  
2369917

The following are our comments on the Endangerment Assessment.

Specific Comments

- ✓ 1. Page 1-1, paragraph 1 - Guam is a Territory of the United States, not a Trust Territory.
- ✓ 2. Page 2-1, paragraph 1 - The first sentence should be rewritten to read; "Ordot Landfill is located near the village of Ordot on the island of Guam in the Mariana Island chain in the Western Pacific (Figure 2-1)."
- ✓ 3. Page 2-1, paragraph 3 - The third sentence of this paragraph should be rewritten to read; "The wet season runs from July to December and marks the beginning of the typhoon season."
- ? ✓ 4. Page 2-1, paragraph 3 - There are no surface waters in the volcanic region which are upgradient from Ordot Landfill and used for drinking water sources. The Geus River, in Merizo, and Fena Lake are the only sources of potable water in the volcanic southern region of Guam.  
*P-2-3 summary*
- ✓ 5. Page 2-6, paragraph 1 - The first sentence of this paragraph should be rewritten to read; "The Ordot Landfill is located within the municipality of Ordot-Chalan Pago, approximately 2-1/2 miles south of Agana Village and approximately 1 mile west from the village of Ordot."  
*village / km*
- ✓ 6. Page 2-6, paragraph 2 - Specific information regarding collection of air samples at the site should be provided. This should include a description of what "real time" ambient air sampling means. *about HAN, ODS etc*
- ✓ 7. Page 2-7, paragraph 1 - The University of Guam's Water and Energy Research Institute (WERI) completed installation of all monitoring wells in early 1986. To the best of our knowledge, there were no monitoring wells in place at Ordot Landfill during 1982.
- ✓ 8. Page 2-11, paragraph 1 - See comment #7.
- ✓ 9. Page 2-11, paragraph 1 - The statement that an on-site leachate pond was utilized for WERI's monitoring wells should be attributed to Camp Dresser & McKee's 1986 technical scope of work, and not Black and Veatch.
- ✓ 10. Page 2-15, paragraph 2 - Chemicals of concern should also include those constituents found in leachate and all downgradient wells. Disagree with Clement Associates response to CH<sup>2</sup>M Hill comments (2), (13) and (14). Leachate is known to be released directly into the Lonfit River and does present a potential health hazard.
- { 11. Pages 5-1 thru 5-6 - This Section, particularly Section 5-3, nullifies the findings of "No further action" in the Proposed Remedial Action Plan. All evidence points to additional sampling to enlarge data base.

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